

**IN THE UNITED STATES DISTRICT COURT FOR THE
DISTRICT OF NEW JERSEY**

)
IN RE: JOHNSON & JOHNSON)
TALCUM POWDER PRODUCTS)
MARKETING, SALES PRACTICES AND) MDL Docket No. 2738
PRODUCTS LIABILITY LITIGATION)

)
This Document Relates To All Cases)
)

SECOND SUPPLEMENTAL CERTIFICATION OF JULIE L. TERSIGNI

1. I am an attorney at law of the State of New Jersey and am an associate of the law firm of Drinker Biddle & Reath LLP, attorneys for Defendants Johnson & Johnson and Johnson & Johnson Consumer Inc., formerly known as Johnson & Johnson Consumer Companies, Inc. I submit this Certification based on personal knowledge in further support of Defendants' Omnibus to Exclude the Opinions of Plaintiffs' Experts for General Causation *Daubert* Hearing.

2. Attached hereto are true and correct copies of the following exhibits:

Section A: Scientific Studies, Editorials and Other Articles (cont.)	
Exhibit No.	Description
A183	Austin & Hux, <i>A Brief Note on Overlapping Confidence Intervals</i> , 36 J. Vasc Surg. 194 (2002)
A184	Doyle, <i>Talcum Powder May Cause Cancer</i> , The Scotsman (Edinburgh, Scotland), Oct. 22, 1997

Section A: Scientific Studies, Editorials and Other Articles (cont.)

Exhibit No.	Description
A185	Fletcher et al., <i>Specific point mutations in key redox enzymes are associated with chemoresistance in epithelial ovarian cancer</i> , 102 Free Radic Biol Med. 122 (2017)
A186	Helmenstine, “6 Steps of the Scientific Method,” Thought Co., https://www.thoughtco.com/steps-of-the-scientific-method-p2-606045 (last updated Sept. 2, 2018)
A187	Knezevic, <i>StatNews #73: Overlapping Confidence Intervals and Statistical Significance</i> , Cornell Statistical Consulting Unit, Cornell University (Oct. 2008)
A188	Knol et al., <i>The (mis)use of overlap of confidence intervals to assess effect modification</i> , 26(4) Eur J. Epidemiol. 253 (2001)
A189	Leung et al., <i>Shift Work Patterns, Chronotype, and Epithelial Ovarian Cancer Risk</i> , Cancer Epidemiol Biomarkers Prev. 987 (2019)
A190	McArthur, <i>Powder a Risk for Women</i> , Herald Sun (Australia), Feb. 20, 2009
A191	Merletti et al., <i>Target Organs for Carcinogenicity of Chemicals and Industrial Exposures in Humans: A Review of Results in the IARC Monographs on the Evaluation of the Carcinogenic Risk of Chemicals to Humans</i> , 44 Cancer Res. 2244 (1984)
A192	Muscat & Huncharek, <i>Perineal Talc Use and Ovarian Cancer: A Critical Review</i> , 17 Eur J Cancer Prev. 139 (2008)
A193	Payton et al., <i>Overlapping Confidence Intervals or Standard Error Intervals: What do they mean in terms of statistical significance?</i> , 3(34) J. Insect Science 1 (2003)
A194	Ryan & Leadbetter, <i>On The Misuse of Confidence Intervals For Two Means In Testing For the Significance Of the Difference Between the Means</i> , 1(2) J. Modern Applied Stat. Methods 473 (2002)
A195	Schenker & Gentleman, <i>On Judging the Significance of Differences by Examining the Overlap Between Confidence Intervals</i> , 55(3) The Amer. Statistician 182 (2001)
A196	Straif et al., <i>A Review of Human Carcinogens—Part C: Metals, Arsenic, Dusts, and Fibres</i> , 10 Lancet 453 (2009)

Section A: Scientific Studies, Editorials and Other Articles (cont.)

Exhibit No.	Description
A197	Zorn et al., <i>Gene Expression Profiles of Serous, Endometrioid, and Clear Cell Subtypes of Ovarian and Endometrial Cancer</i> , 11(18) Clinical Cancer Res. 6422 (2005)

Section B: MDL Depositions and Exhibits (cont.)

Exhibit No.	Description
B52	Exhibit 15 to Deposition of Judith Zelikoff, Ph.D., Jan. 21, 2019

Section C: MDL Expert Reports and CVs (cont.)

Exhibit No.	Description
C42	Excerpts of Longo & Rigler, Supplemental Report: The Analysis of Johnson & Johnson's Historical Product Containers and Imerys' Historical Railroad Car Samples from the 1960's to the Early 2000's for Amphibole Asbestos, Jan. 15, 2019

Section D: Produced Documents (cont.)

Exhibit No.	Description
D9	JNJAZ55_000008893

Section E: Non-MDL Depositions, Transcripts, Expert Reports and Court Filings¹ (cont.)

Exhibit No.	Description
E34	Excerpts of the Deposition of Alice M. Blount, Ph.D., <i>Ingham v. Johnson & Johnson</i> , No. 1522-CC10417-01 (Mo. Cir. Ct. Apr. 13, 2018)
E35	Excerpts of the Deposition of William E. Longo, Ph.D., <i>Anderson v. Borg-Warner Corp.</i> , No. JCCP 5674/BC666513 (Cal. Super. Ct. Mar. 29, 2018) (additional excerpts previously attached as Exhibit E3 to the Omnibus Certification of Julie L. Tersigni (ECF No. 9723-2))
E36	Excerpts of the Deposition of William E. Longo, Ph.D., <i>Rimondi v. BASF Catalysts LLC</i> , No. MID-L-2912-17 (N.J. Super. Ct. Law Div. Jan. 7, 2019) (additional excerpts previously attached as Exhibit E6 to the Omnibus Certification of Julie L. Tersigni (ECF No. 9723-2))
E37	Excerpts of the Deposition of William E. Longo, Ph.D., <i>Von Salzen v. Am. Int'l Indus. Inc.</i> , JCCP 4674/No. BC680576 (Cal. Super. Ct. June 27, 2018) (additional excerpts previously attached as Exhibit E8 to the Omnibus Certification of Julie L. Tersigni (ECF No. 9723-2))

Section I: Miscellaneous MDL Documents (cont.)

Exhibit No.	Description
I4	Complete List of Materials Reviewed and Considered by H. Nadia Moore, Ph.D., DABT, ERT, as of Apr. 3, 2019
I5	Transcript of Status Conference, Apr. 29, 2019 ²

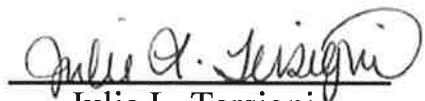
¹ Relevant testimony in deposition transcripts is highlighted for the Court.

² Relevant discussion is highlighted for the Court.

Section J: Miscellaneous: Other Documents (cont.)	
Exhibit No.	Description
J7	<i>Functions of Lymphatic System</i> , MANanatomy.com, http://www.mananatomy.com/basic-anatomy/functions-lymphatic-system (last visited June 12, 2019)

3. I certify that the foregoing statements made by me are true. I am aware that if any of the foregoing statements made by me are willfully false, I may be subject to punishment.

Dated: June 17, 2019


Julie L. Tersigni